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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case,
No. 19-30088 (DM).*

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Case No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

**NOTICE OF FILING OF FOURTH
SUPPLEMENT TO PLAN SUPPLEMENT
IN CONNECTION WITH DEBTORS' AND
SHAREHOLDER PROPONENTS' JOINT
CHAPTER 11 PLAN OF
REORGANIZATION**

[Relates to Dkt. No. 7037, 7503, 7563, 7712]

1 **PLEASE TAKE NOTICE** that, on September 9, 2019, PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the “**Utility**”), as debtors and debtors in possession (collectively, the “**Debtors**”) in the above-captioned chapter 11 cases, filed the *Debtors’ Joint Chapter 11 Plan of Reorganization* [Dkt. No. 3841], which was thereafter amended, modified, or supplemented on September 23, 2019 and November 4, 2019 [Dkt. Nos. 3966 and 4563, respectively].

4 **PLEASE TAKE FURTHER NOTICE** that, on December 12, 2019, the Debtors filed the *Debtors’ and Shareholder Proponents’ Joint Chapter 11 Plan of Reorganization Dated December 12, 2019* [Dkt. No. 5101], which was thereafter amended, modified, or supplemented on January 31, 2020, February 7, 2020, March 9, 2020, March 16, 2020, and May 22, 2020 [Dkt. Nos. 5590, 5700, 6217, 6320, and 7521 respectively] (and as may be further amended, modified, or supplemented and together with all exhibits and schedules thereto, the “**Plan**”).

8 **PLEASE TAKE FURTHER NOTICE** that, on May 1, 2020, the Debtors filed the *Notice of Filing of Plan Supplement in Connection with Debtors’ and Shareholder Proponents’ Joint Chapter 11 Plan of Reorganization Dated March 16, 2020* [Dkt. No. 7037] (as supplemented on May 22, 2020 [Dkt. No. 7503], May 24, 2020 [Dkt. No. 7563], and June 2, 2020 [Dkt. No. 7712], and as may be further amended, modified, or supplemented, the “**Plan Supplement**”).

12 **This Fourth Supplement to the Plan Supplement contains the following document:**

- 13 • Exhibit A – Second Amendment to Schedule of Executory Contracts and Unexpired Leases to be Assumed Pursuant to the Plan and Proposed Cure Amounts (the “**Schedule of Assumed Contracts**”)

15 **PLEASE TAKE FURTHER NOTICE** that the Schedule of Assumed Contracts has been amended to, among other things, (i) add or delete certain agreements from the Schedule of Assumed Contracts (including, without limitation, to remove certain contracts that have expired, terminated, or have otherwise been identified as non-executory and not subject to assumption), (ii) revise potential Cure Amounts with respect to certain agreements identified for assumption pursuant to the Plan, and (iii) provide additional information with respect to the descriptions of certain agreements referred to in the Schedule of Assumed Contracts. Pursuant to Section 8.1 of the Plan, the exclusion of any contract or lease from the Schedule of Assumed Contracts shall not constitute a rejection of such contract or unexpired lease. The notice, global notes, and disclaimers that accompanied the Schedule of Assumed Contracts are incorporated herein by reference and apply with equal force with respect to all the agreements set forth in the Second Amendment.

22 **PLEASE TAKE FURTHER NOTICE** that the Plan Supplement documents attached hereto remain subject to (i) further review, negotiations, and modifications, and (ii) final documentation in a manner consistent with the Plan, the Subrogation Claims RSA, the Tort Claimants RSA, the Noteholder RSA, the Backstop Commitment Letters, and the other Plan Documents, as applicable.

25 **PLEASE TAKE FURTHER NOTICE** that the Debtors and Shareholder Proponents reserve the right to amend the documents contained in the Plan Supplement before the Effective Date in accordance with the terms of the Plan, the Subrogation Claims RSA, the Tort Claimants RSA, the Noteholder RSA, the Backstop Commitment Letters, and the other Plan Documents, as applicable.

28 **PLEASE TAKE FURTHER NOTICE** that copies of the pleadings and other documents identified herein can be viewed and/or obtained: (i) by accessing the Bankruptcy Court’s website at

1 <http://www.canb.uscourts.gov>, (ii) by contacting the Office of the Clerk of the Court at 450 Golden Gate
2 Avenue, San Francisco, CA 94102, or (iii) from the Debtors' notice and claims agent, Prime Clerk LLC,
3 at <https://restructuring.primeclerk.com/pge> or by calling (844) 339-4217 (toll free) for U.S.-based
parties; or +1 (929) 333-8977 for International parties or by e-mail at: pgeinfo@primeclerk.com. Note
that a PACER password is needed to access documents on the Bankruptcy Court's website.

4 Dated: June 5, 2020

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7 Thomas B. Rupp

8 *Attorneys for Debtors and Debtors in Possession*